

- continued -

BellSouth Pre-Order Field Name	BellSouth Firm Order Field Name	BellSouth Firm Order Form	Example Data
N/A	LNA	PS	V
N/A	LNUM	PS	00001
N/A	LOCNUM	PS	000
N/A	LPIC	PS	NONE
N/A	PIC	PS	NONE
TN	TNS	PS	2285559458
N/A	FA	PS	N
N/A	FEATURE	PS	ESX
N/A	FA	PS	N
N/A	FEATURE	PS	UEG2D
N/A	FA	PS	N
N/A	FEATURE	PS	TTB
N/A	LNA	PS	V
N/A	LNUM	PS	00002
N/A	LPIC	PS	NONE
N/A	PIC	PS	NONE
TN	TNS	PS	2285554583
N/A	FA	PS	N
N/A	FEATURE	PS	TTB
N/A	FA	PS	N
N/A	FEATURE	PS	UEG2D
N/A	LNA	PS	V
N/A	LNUM	PS	00004
N/A	LPIC	PS	NONE
N/A	PIC	PS	NONE
TN	TNS	PS	2285559194

- continued -

- continued -

BellSouth Pre-Order Field Name	BellSouth Firm Order Field Name	BellSouth Firm Order Form	Example Data
N/A	FA	PS	N
N/A	FEATURE	PS	TTB
N/A	FA	PS	N
N/A	FEATURE	PS	UEG2D
N/A	LNA	PS	V
N/A	LNUM	PS	00002
N/A	LPIC	PS	NONE
N/A	PIC	PS	NONE
TN	TNS	PS	2285553938
N/A	FA	PS	N
N/A	FEATURE	PS	BCR
N/A	FA	PS	N
N/A	FEATURE	PS	UEG2D

**A.6 Scenario #6 – REQ TYP: M; ACT: V; Description: Full conversion from resale/retail account to port loop combo with block choices, “No Collect,” and no directory assistance call completion**

BellSouth Pre-Order Field Name	BellSouth Firm Order Field Name	BellSouth Firm Order Form	Example Data
N/A	CCNA	LSR	BST
INQ-NUM	PON	LSR	FT69RTST2
ATN	ATN	LSR	8645554765
N/A	SC	LSR	LCSC
N/A	D/SENT	LSR	20000108
DUE DATE	DDD	LSR	20000223
N/A	REQ TYP	LSR	MB

- continued -

- continued -

BellSouth Pre-Order Field Name	BellSouth Firm Order Field Name	BellSouth Firm Order Form	Example Data
N/A	ACT	LSR	V
N/A	CC	LSR	8002
N/A	PORTTYP	LSR	L
LSO-NPA-TTA	LSO	LSR	864555
N/A	TOS	LSR	2BF
N/A	CIC	LSR	5124
N/A	BAN1	LSR	803Q895733733
N/A	INIT	LSR	KAREN DOE
N/A	INIT-TEL-NO	LSR	4045557493
N/A	INIT-FAX-NO	LSR	4045558339
N/A	IMPCON	LSR	KAREN DOE
N/A	IMPCON-TEL-NO	LSR	4045557493
N/A	DQTY	EU	000
N/A	EU-NAME	EU	BARNEY RUBBLE
HOUSE-NUM	SANO	EU	208
STREET-DIR	SASD	EU	S
STREET-NAME1	SASN	EU	BROAD
THOROUGHFARE	SATH	EU	ST
CITY	EU-CITY	EU	CLINTON
STATE	EU-STATE	EU	SC
ZIP-CODE	EU-ZIP CODE	EU	29325
N/A	ERL	EU	Y
N/A	EATN	EU	8645554765
N/A	PQTY	PS	001
N/A	BA	PS	A

- continued -

- continued -

BellSouth Pre-Order Field Name	BellSouth Firm Order Field Name	BellSouth Firm Order Form	Example Data
N/A	BLOCK	PS	CH
N/A	LNA	PS	V
N/A	LNUM	PS	00001
TN	LPIC	PS	0288
N/A	PIC	PS	0288
N/A	TNS	PS	8645554765
N/A	FA	PS	N
N/A	FEATURE	PS	UEG2R

A.7



**REDACTED FOR  
PUBLIC INSPECTION**



1           STATE OF ALABAMA  
2           ALABAMA PUBLIC SERVICE COMMISSION  
3           MONTGOMERY, ALABAMA  
4

5           IN RE: Petition for Approval of a  
6           Statement of Generally Available Terms  
7           and Conditions pursuant to Section 252(f)  
8           of the Telecommunications Act of 1996 and  
9           Notification of Intention to File a  
10          Petition for In-Region InterLATA  
11          Authority with the FCC pursuant to  
12          Section 271 of the Telecommunications Act  
13          of 1996.

14                   DOCKET NO. 25835  
15

16                   VOLUME V  
17           CONTINUATION OF THE PROCEEDINGS  
18           taken before the Alabama Public Service  
19           Commission in the above-referenced matter  
20           on Friday, June 29, 2001, commencing at  
21           9:45 a.m. in the hearing room of the  
22           Alabama Public Service Commission, the  
23           RSA Union Building, 100 North Union  
24           Street, Room 904, Montgomery, Alabama,  
25           before Amy L. Maddox, Certified Shorthand  
26           Reporter and Notary Public in and for the  
27           State of Alabama at Large.

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                  FAX (334) 834-6048

. . . . .



3636

1 percentage, during the peak times, the  
2 heavy times, would be taking a half an  
3 hour versus a half a day? And then I  
4 will ask you the same thing for when the  
5 times are not so busy.

6 A. That would be a purely guesstimate on my  
7 part and I would be hesitant to guess.

8 Q. You cannot make a -- from your experience  
9 with their systems as their paid  
10 consultant, you can't give me a  
11 reasonable estimation?

12 MS. EDWARDS: Your Honor, she  
13 answered the question. If she  
14 doesn't know, she doesn't know.

15 JUDGE GARNER: Either she knows or  
16 she doesn't. If you're not  
17 comfortable making that  
18 estimate --

19 A. That's not my area of support. I mean, I  
20 can estimate that it would be roughly 60  
21 percent that would take longer, but it's  
22 an estimate.

23 Q. Okay. That's fine. Has DeltaCom  
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1 integrated its ordering and pre-ordering  
2 interfaces?

3 A. Yes, sir, we have.

4 Q. When did you accomplish that?

5 A. Last year.

6 Q. What is your ordering interface and your  
7 pre-ordering interface?

8 A. My pre-ordering interface is TAG.

9 Typically my ordering interface is  
10 normally EDI. It can also be LENS; it  
11 can also be manual; and in some cases, if  
12 a vendor is acting on our behalf, it is  
13 also TAG.

14 Q. Okay. Thank you.

15 A. You're welcome.

16 Q. Now, let's jump into some of this  
17 testimony. As I understand it, you  
18 performed an audit of the Alabama PMAP  
19 data on the maintenance average duration  
20 UNE loops and the customer trouble report  
21 rate UNE loops for February 2001?

22 A. I think sample is probably -- audit or  
23 sample, yes.

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7           Q    Let's talk a little bit about address  
8                   validation.  Has MCI integrated its  
9                   preordering and ordering interfaces?

10          A    MCI has worked to integrate the service  
11                address validation test, if you will, from  
12                the BellSouth TAG system into our  
13                ordering.

14                   TAG will give us partial information  
15                that we can drop right into our orders.  
16                And that partial information is put in  
17                those orders when TAG is available and the  
18                record comes back to us.

19          Q    So MCI uses TAG for preordering and EDI  
20                for ordering?

21          A    Yes, that is correct.  TAG is an  
22                electronic interface based on the CORBA,  
23                C-O-R-B-A, standard, and with changes --  
24                proprietary changes from BellSouth.

25          Q    And MCI has integrated the preordering and

1 DOCKET NO. P-55, SUB 1022, VOLUME 10

2

3 ordering functions for address validation?

4 A Yes. For a portion of the service address

5 validation. Other -- the community name

6 is not what we call parsed or fielded, so

7 it cannot be placed directly into the

8 order.

9 Q Is there any other part of the preordering

10 and ordering interfaces MCI has

11 integrated?

12 A No. There are no others.

13 Q You mentioned the parsed CSR, and then

14 your testimony on page 27, you state the

15 CSR, quote, "cannot be integrated," close

16 quote.

17 What steps has MCI taken to try to

18 integrate?

19 A MCI's has worked closely with BellSouth to

20 develop the requirements for BellSouth to

21 provide the fielded and parsed CSR. That

22 is to provide a CSR that has the length of

23 each field the same from the actual

24 customer service record to what is

25 required in the order.

1 DOCKET NO. P-55, SUB 1022, VOLUME 10

2

3 MCI and the other CLECs worked with  
4 BellSouth to do this, but BellSouth has  
5 yet to make that functionality available.

6 Q Well, I understand your position on  
7 development of the parsed CSR, but my  
8 question really is: Has MCI made any  
9 attempt to integrate TAG and EDI  
10 preordering and ordering other than the  
11 address validation?

12 A No. Because we cannot integrate a  
13 nonparsed nonfielded CSR. It is merely a  
14 blob of information that the computers  
15 cannot read and put it into the proper  
16 places in the orders.

17 Q Have you ever talked to any third  
18 parties -- third-party vendors that have  
19 advertised their capabilities to integrate  
20 preordering and ordering?

21 A Not in the BellSouth region.

22 Q You never investigated the opportunity to  
23 do that?

24 A At this point, no, not in the BellSouth  
25 region.

1 DOCKET NO. P-55, SUB 1022, VOLUME 10

2

3 Q Okay. Are you aware of other CLECs that  
4 have told us they have fully integrated  
5 preordering and ordering?

6 A No, I am not.

7 Q Now, for an LSR to flow through  
8 BellSouth's systems, the address on the  
9 LSR must match the address that's in  
10 BellSouth's regional street address guide  
11 or RSAG, correct?

12 A Yes. That is my understanding.

13 Q And I think you told me in South Carolina,  
14 and would probably tell me again today,  
15 that MCI does not want their LSRs to be  
16 rejected, right?

17 A Yes. We prefer to be able to get them  
18 through the first time.

19 Q And BellSouth personnel have told MCI  
20 personnel on numerous occasions that MCI  
21 must place the asterisks in the address  
22 for -- if the asterisks shows up in the  
23 address in RSAG for the order to flow  
24 through, correct?

25 A Actually, that story changed last Thursday

1 DOCKET NO. P-55, SUB 1022, VOLUME 10

2

3 when BellSouth personnel told MCI that in  
4 the former Southern Bell states, that a  
5 properly constructed address where MCI did  
6 not send the asterisk would flow through  
7 and the order would complete.

8 They said, however, that this is not  
9 the case in the South Central Bell region.

10 Q And wasn't what they told you actually,  
11 Ms. Lichtenberg, dealing with an interim  
12 fix that was put in the systems that  
13 should now no longer cause those orders to  
14 flow through?

15 A No. They didn't mention an interim fix.  
16 And I've not seen such documentation.

17 Q Okay. For the states for which BellSouth  
18 has still told you that you're required to  
19 put an asterisk in your address, has MCI  
20 changed its systems or does it have any  
21 plans to change its systems to account for  
22 that asterisk?

23 A MCI is not doing business in a former  
24 South Central Bell state.

25 Q Okay. So MCI's position is that it will



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2

3 continue to submit the asterisks in its  
4 address.

5 A MCI does not submit an asterisk in the  
6 address. An asterisk is a nonstandard  
7 character. And because it is used as a  
8 delimiter, EDI prohibits its use in  
9 actually set in -- as a character in the  
10 order.

11 Q I'm sorry. I said it backwards. MCI is  
12 going to continue to not submit the  
13 asterisk.

14 A That's correct. Because those orders flow  
15 through in Georgia just fine.



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1           STATE OF ALABAMA  
2           ALABAMA PUBLIC SERVICE COMMISSION  
3           MONTGOMERY, ALABAMA  
4

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13       of 1996.

14                   DOCKET NO. 25835  
15                   VOLUME IV-A  
16       CONTINUATION OF THE PROCEEDINGS  
17       taken before the Alabama Public Service  
18       Commission in the above-referenced matter  
19       on Thursday, June 28th, 2001, commencing  
20       at 8:35 A.M. in the hearing room of the  
21       Alabama Public Service Commission, Room  
22       904, RSA Union Building, 100 Union  
23       Street, Montgomery, Alabama, before Ricky  
24       L. Tyler, Certified Shorthand Reporter  
25       and Notary Public in and for the State of  
26       Alabama at Large.

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4 CROSS-EXAMINATION

5 BY MR. MCCALLUM:

6 Q. Good afternoon, Mr. Bradbury; my name is  
7 Fred McCallum; I represent BellSouth. I  
8 want to start this afternoon with just  
9 some basic information on interfaces that  
10 AT&T uses. What interfaces does AT&T use  
11 for obtaining pre-ordering information  
12 today?

13 A. We currently are using LENS and TAG.

14 Q. And how long have you been using LENS and  
15 TAG, just approximately?

16 A. We've been using LENS probably from the  
17 1997 time frame.

18 Q. Okay.

19 A. TAG not until probably sometime in '99,  
20 2000 possibly.

21 Q. Okay. And what interface does AT&T use  
22 for obtaining ordering information?

23 A. We are now using both EDI and LENS.  
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1 Q. And roughly how long have you used both  
2 of those?

3 A. We've began using EDI in 1997. We began  
4 using LENS on a production basis this  
5 year.

6 Q. Okay. Now, the first issue that you  
7 talked about deals with -- substantive  
8 issue deals with parsing, correct?

9 A. Correct, I do deal with parsing.

10 Q. And specifically parsing the Customer  
11 Service Record?

12 A. Correct.

13 Q. Now, that also has to do with the concept  
14 of integration, does it not?

15 A. Yes. A parsed Customer Service Record  
16 would be integratable into the ordering  
17 process.

18 Q. Okay. And integration, as you just said,  
19 is the ability of a CLEC to automatically  
20 populate information supplied by the  
21 pre-ordering system, as I understand it,  
22 onto an ordering form known as the  
23 LSR --

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- 1 A. That's correct.  
2 Q. -- in a way that won't be rejected by the  
3 BOC's system; is that correct?  
4 A. That's correct.  
5 Q. Now, can you describe for me what work  
6 AT&T has been doing in its systems in  
7 order to integrate pre-ordering with  
8 ordering? And I guess for purposes of  
9 this question you would be integrating  
10 TAG with EDI, I would assume; is that  
11 correct?  
12 A. You're asking me to describe the work  
13 that AT&T has been doing internally to do  
14 that integration?  
15 Q. Yes.  
16 A. I'm sorry, I can't do that. I have not  
17 been a part of that effort.  
18 Q. Is there an effort like that going on,  
19 though, at AT&T, to your knowledge?  
20 A. I don't have any personal knowledge, but  
21 I would be very surprised if it wasn't.  
22 Q. You would be very surprised if it was  
23 not?

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1 A. Correct.

2 Q. *Okay. And why is it that you don't have*  
 3 *any knowledge or any input into that*  
 4 *process?*

5 A. *It's just an area that I haven't spent*  
 6 *any time in. My dealings are to get from*  
 7 *BellSouth what our business units need in*  
 8 *terms of access to the interfaces; what*  
 9 *the business units then do to integrate*  
 10 *is not part of my regular job*  
 11 *responsibilities. I do know that we have*  
 12 *integrated in the past TAG with the EDI*  
 13 *interface and I know that work has been*  
 14 *done there and I would assume it's still*  
 15 *going on.*

16 Q. *Okay. You know that you have integrated*  
 17 *TAG with EDI; do you know approximately*  
 18 *when that occurred or when that was done?*

19 A. *Probably sometime in mid-to-late 1999.*

. . . . .

Q. Are you aware of any other CLECs who have  
 7 integrated their pre-ordering and  
 8 ordering interfaces that it uses to  
 9 submit orders to BellSouth?

10 A. I don't have any personal knowledge.  
 11 I've read BellSouth's testimony that  
 12 there are a number of them who apparently  
 13 have done some integration work.

14 Q. Okay. Well, you've gotten to it. You  
 15 haven't done anything individually to  
 16 find out or ask other CLECs if they --  
 17 what they've done as far as integrating  
 18 pre-ordering and ordering, correct?

19 A. No, I have not.

20 Q. Has AT&T, to your knowledge, done  
 21 anything with regard to asking other  
 22 CLECs, talking with other CLECs about  
 23 whether they've been able to integrate

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3002

1 pre-ordering and ordering interfaces?

2 A. I don't know.

3 Q. Okay. Now, you mentioned that  
4 BellSouth's testimony does include some  
5 estimates from BellSouth as far as the  
6 amount of integration that is being done,  
7 correct?

8 A. Yes.

9 Q. Do you have any information here today  
10 that would disprove those -- the  
11 allegations that are in BellSouth's  
12 testimony?

13 A. I have no information to disprove or  
14 prove.

15 Q. Now, does AT&T have any information that  
16 you know of that would disprove those  
17 contentions that CLECs have in fact  
18 integrated pre-ordering and ordering  
19 systems?

20 A. Not to my knowledge.

21 Q. Are you familiar with the third-party  
22 vendors who work with CLECs and with  
23 BellSouth to integrate pre-ordering and  
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3003

1 ordering systems?

2 A. I'm aware that there are third-party  
3 vendors who do that type of work, yes.

4 Q. And do you know of any third-party  
5 vendors who have developed the ability to  
6 integrate pre-ordering and ordering  
7 systems with BellSouth?

8 A. I know from reading the trade press there  
9 are a number who advertise that they have  
10 done that. Whether they have in fact, I  
11 don't know; you might want to speak to  
12 one of their customers.

13 Q. So I assume AT&T is not a customer of any  
14 one of those third-party vendors?

15 A. Not to my knowledge.

16 Q. Okay. Have you personally spoken with  
17 any of those third-party vendors about  
18 whether they have done such a thing,  
19 integrated pre-ordering and ordering?

20 A. I've attended some trade shows where they  
21 participate and I've looked at their  
22 promotional materials.

23 Q. So at least they hold themselves out and  
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